

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

BLUE CROSS BLUE SHIELD
ASSOCIATION, et al.,

Plaintiffs,

V.

GLAXOSMITHKLINE L.L.C.,

Defendant.

Case No. 2:12-cv-4663-JS

**PLAINTIFFS' MOTION FOR LEAVE TO
FILE "CONFIDENTIAL" AND "HIGHLY
CONFIDENTIAL" MATERIALS UNDER SEAL**

Plaintiffs, by and through their undersigned counsel, respectfully seek leave to file under seal materials containing or referencing "Confidential" and "Highly Confidential" information.

In support of this Motion, plaintiffs aver as follows:

1. On February 15, 2017 this Court entered a Protective Order in the above-captioned matter (the "Protective Order") to protect and maintain the confidentiality of Discovery Materials designated by the parties as "Confidential" or "Highly Confidential." *See* Dkt. 117.

2. The Protective Order provided that, if "a party desires to file Confidential or Highly Confidential Materials under seal, it shall file by ECF...a motion for leave to file under seal without making reference to the substance of the Confidential or Highly Confidential Materials." Protective Order ¶ 13(a).

3. Plaintiffs respectfully see leave to file under seal the following documents: (1) Plaintiffs' Pretrial Memorandum; (2) Exhibit B to Plaintiff's Pretrial Memorandum; and (3) Exhibit C to Plaintiffs' Pretrial Memorandum.

4. If the Court grants Plaintiffs' Motion for Leave, Plaintiffs will file via ECF redacted versions of the foregoing materials within 10 business days pursuant to the Court's Order dated November 5, 2018. *See* Dkt. 199.

5. Defendant GSK has consented to this Motion.

WHEREFORE, PLAINTIFFS respectfully request that the court grant the Motion and enter an Order permitting Plaintiffs to file under seal the materials identified in Paragraph 3.

Dated: November 1, 2019
White Plains, NY

Respectfully submitted,

LOWEY DANNENBERG, P.C.

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CERTIFICATE OF SERVICE

I certify that on November 1, 2019 I served the foregoing Plaintiffs' Plaintiffs' Motion for Leave to File "CONFIDENTIAL" and "HIGHLY CONFIDENTIAL" Materials by ECF on the following counsel:

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